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February 15, 2019

**VIA ECF**

Judge John G. Koeltl  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Eastern Profit Corporation Limited v. Strategic Vision US LLC*,  
Civil Action No. 18-CV-2185.

Dear Judge Koeltl,

Plaintiff Eastern Profit Corporation Limited (“Eastern”) hereby respectfully requests that the discovery deadline in this matter be extended forty-five days to April 15, 2019. That deadline is currently February 28, 2019. During the depositions of J. Michael Waller and Strategic Vision US LLC’s (“SV”) 30(b)(6) deponent, it became apparent that important documentary discovery, responsive to Eastern’s discovery requests, had not been produced yet by SV. SV has also indicated that it may follow up on its documentary discovery requests with Eastern in light of its deposition of Eastern’s 30(b)(6) deponent. In addition, the parties are yet to resolve their discovery disputes concerning the identity of the individuals who performed the investigatory research for the contract at issue (among other items) which may entail a motion to compel. Thus, there is good cause to extend the discovery deadline in this case.

This is the second request to extend the discovery deadline in this case. Counsel for Strategic Vision US LLC and Guo Wengui consent to this request. Pursuant to this Court’s procedures, a proposed revised scheduling order is attached to this letter, which takes into account the proposed deadlines in this matter.

Eastern Profit Corporation Limited

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**CERTIFICATE OF SERVICE**

I hereby certify that this document will be served by email on all counsel of record on February 15, 2019.

/s/ Zachary Grendi  
Zachary Grendi, Esq.